

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: NONJUDICIAL FORFEITURE  
PROCEEDING

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MBD. No. 20-mc-

**ASSENTED-TO MOTION TO EXTEND DEADLINE**  
**FOR THE UNITED STATES TO FILE CIVIL FORFEITURE COMPLAINT**

The United States of America, by its attorney, Andrew E. Lelling, United States Attorney for the District of Massachusetts, with the assent of the only person to identify themselves as a Claimant to date, pursuant to 18 U.S.C. § 983(a)(3)(A), respectfully requests an extension of time to file a civil forfeiture complaint against the following seized property:

- a. \$6,000 in United States currency seized from Moses Cabral on June 16, 2020 (the “Currency”).

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) seized the Currency and commenced administrative forfeiture proceedings. On or about July 21, 2020, the ATF received a claim for the Currency from Moses Cabral, through one of his attorneys, Ian Stearns, at Goodwin Proctor LLP. No other claims were submitted. On or about July 23, 2020, the United States received copies of this claim from the ATF, and pursuant to 18 U.S.C. § 983(a)(3), a civil forfeiture complaint must be filed against the Currency within 90 days after the claim was filed in administrative proceedings. Therefore the civil forfeiture complaint should be filed on or before October 19, 2020.

Pursuant to 18 U.S.C. § 983(a)(3)(A), the Court may extend the time to file a civil forfeiture action upon agreement of the parties. The Parties are in agreement and respectfully request the Court grant an extension of the civil forfeiture complaint deadline for an additional 90 days.

WHEREFORE, the United States respectfully requests that it be permitted to file the civil forfeiture complaint on or before January 17, 2021.

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

By: /s/ Carol E. Head  
CAROL E. HEAD  
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Dated: October 8, 2020

**CERTIFICATE OF SERVICE**

I, Carol E. Head, Assistant United State Attorney, certify that the foregoing motion, filed through the Electronic Case Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and sent via email to Attorney David J. Apfel.

/s/ Carol E. Head  
CAROL E. HEAD  
Assistant United States Attorney

Dated: October 8, 2020